Greater Cambridge Local Plan

Proposed Submission (Regulation 19) Consultation - Response Form

Please submit your comments (known as representations) by **5pm** on **Friday 25 September 2026**.

Data Protection and Freedom of Information

We will treat your data in accordance with our Privacy Notice. All personal information that you provide will be used solely in relation to the Greater Cambridge Local Plan.

Please note that each representation and the name of the person or organisation who made the representation, and the name and organisation of the agent (where used), will be published on our website - representations cannot be treated as confidential.

Additionally, respondent details and representation(s) will be made available to the Planning Inspectorate and to the Inspector appointed by the Secretary of State to conduct the examination.

By submitting this response form you are agreeing to these conditions.

About this Response Form

This response form has two parts:

- Part A – Your details. We cannot formally register your comments without your details.
- Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make. If you need more space to provide your answers, please expand the boxes or continue on an attached separate sheet.

We strongly encourage the submission of representations via our consultation platform at https://consultations.greatercambridgeplanning.org/proposed-submission-greater-cambridge-local-plan If you are unable to submit your representation using our online system, this response form is available to downloaded to complete electronically from www.greatercambridgeplanning.org/local-plan.

Your completed response form should be:

- emailed to localplan@greatercambridgeplanning.org, or
- posted to: Greater Cambridge Shared Planning Policy Team, South Cambridgeshire District Council, South Cambridgeshire Hall, Cambourne Business Park, Cambourne, Cambridge, CB23 6EA

If you are having difficulty submitting your comments, please contact localplan@greatercambridgeplanning.org or call 01954 713694.

Part A: Your Details

Information required	Personal details *	Agent's details (if applicable)
Name	Matthew Appleton	Lisa Foster & Adele Gisby
Organisation (where relevant)	Abington Parish Council	Richard Buxton Solicitors
Job Title (where relevant)	Chair of Parish Council	Solicitor & Paralegal
Address, including Post Code	c/o solicitors	
Telephone	c/o solicitors	
Email address	c/o solicitors	

* If you have appointed an agent to represent you, you only need to complete the Name and Organisation (if applicable) under Personal Details, but you do need to complete the full details of the agent. All correspondence will be sent to the agent.

Part B: Your Representation

Please fill in a separate sheet for each representation.

Section 1: Which document, and section of that document, does your representation relate to?

Document	**Policy / Paragraph / Site / Map** (please identify)
Proposed Submission Greater Cambridge Local Plan	Policy S/GF (objects) Policy S/DS (objects)
Proposed Submission Policies Map	Policy S/GF (objects)
Sustainability Appraisal	See details below
Habitats Regulations Assessment	

Section 2: Do you consider that the Greater Cambridge Local Plan is sound and legally compliant?

Test	**Yes / No**
Legally compliant	No

Sound	No

Section 3: Your representation

Please set out and explain your comments. Please be as precise as possible, and please do not just refer to an attached supporting document(s). For your representation (comments) to be considered, your representation must be set out here. Wherever possible, set out precisely any changes you think should be made to the plan and its policies.

Policy S/GF: Land adjacent to A11 and A1307 at Grange Farm Greater Cambridge Local Plan: Proposed Submission and Policy S/DS Development Strategy
Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

Introduction

1. We are instructed by Abington Parish Council and lodge our client's formal objection to the Regulation 19 Consultation to the proposed Plan and Policies S/GF: Land adjacent to A11 and A1307 at Grange Farm in the Greater Cambridge Local Plan, and Policy S/DS Development Strategy. The Parish Council comprises of councillors elected to represent the approximately 1,500 residents of Great Abington and Little Abington and improve their quality of life.

2. The Parish Council has been supported by Save Abington Village Environment (SAVE)[1] through financial contributions for the legal team and the five technical experts whose reports support these objections. SAVE is submitting their own objection in support of the Parish Council's objection.

3. The Parish Council's independent expert reports address the following matters and are referenced as indicated:

    a. Planning Matters and Evidence Basis – Steven Stroud MRPTI, James Bailey Planning [JB]
    b. Landscape – Pete Leaver CMLI, Robert Davies John West Ltd [PL]
    c. Transport - John Russell, CMILT, MCIHT, JR Transport Planning [JR]
    d. Flood Risk and Hydrology – John Sutton BSc, MSc, GWP Hydrogeological Consultants [GWP]
    e. Heritage – Dr Nicholas Doggett, FSA, MICfA, IHBC, Asset Heritage Consulting Ltd. [ND]

[1] *SAVE is a community-led group, committed to protecting the character, environment, and long-term wellbeing of Abington and its surrounding villages.*

4. The expert reports are submitted as a bundle to accompany this letter; we would respectfully ask that they are read in full.

5. The Parish Council requests to participate in the examination hearings to ensure local residents voices are represented at the EiP and subject to funding will instruct counsel and their experts to attend to assist the Inspectors at the EiP.

Objection to proposed Policy S/GF

6. The Parish Council objects to proposed Policy S/GF: Land adjacent to A11 and A1307 at Grange Farm on the basis the Plan has not been prepared in accordance with legal and procedural requirements and fails the legal requirement for soundness as set out in the 2024 National Planning Policy Framework (NPPF 2024). In summary the Plan is unsound because:

(1) The Plan is not justified in relation to high landscape harm incapable of mitigation:

(i) key evidence contains material inconsistencies and inaccuracies, including the Housing and Economic Land Availability Assessment ('HELAA' 2026), the Sustainability Appraisal ('SA' 2026), the Development Strategy Topic Papers (2026), and the Site Allocations Topic Paper (2026) [JB/2/2.1-2.10]. These inconsistencies and omissions undermine the reliability of the assessment of scale of adverse impacts on this sensitive and vulnerable Cambridgeshire Chalk Hills Landscape comprising Grange Farm and include: -

a. The fact that the site was taken forward despite its 'red' HELAA score requires appropriate mitigation to be addressed in the *Development Strategy and Sites Topic Papers*; however those papers do not adequately explain how the identified significant adverse impacts on the Chalk Hills Landscape could be mitigated [JB/2.3];

b. The 2026 Sustainability Appraisal (SA) fails to record the overall 'red' and significant negative impact rating for Landscape as set out in the HELAA. Instead, the SA records the site as rating 'amber'. As a consequence, the SA process is unreliable and inevitably has led to a downplay in respect of landscape impacts [JB/2.4-2.7];

c. The SA is inconsistent when defining the proposed area being assessed with a variation of 26.98 ha [JB/2.8] which impacts inter alia on site area for infrastructure, landscape and heritage mitigation measures;

d. The failure to justify selection of Grange Farm, a sensitive Chalk Hills Landscape against other less sensitive sites. The Council's own evidence is that the Chalk Hills Landscape is a sensitive landscape typology more vulnerable to change and so the high adverse harm expected from this allocation potentially cannot be mitigated [JB/2.9-2.15;];

e. Significant adverse effects on the landscape will remain with the consequence that the strategic allocation cannot be delivered in accordance with the policy requirement within S/GF (paragraph 12) which requires all phases of masterplanning and design to: *"Ensure the development respects, protects and enhances the landscape within its rural setting, including surrounding chalk hills and woodlands"* [JB/2.16]. As the Landscape expert Pete Leaver records:

There is no evidence that during the decision making process, regard was given to the landscape and visual sensitivities of the site within its landscape and visual context. As a result, the allocation is inconsistent with other local plan policies and with the National Planning Policy Framework. [PL/1.1.11]

The harm goes to the heart of the established settlement pattern of Cambridge: -

> *The landscape south and east of Cambridge is characterised by a pattern of development in valley bottoms and lower valley slopes, with chalk uplands left clear of development. The development parcel of the allocation strays well into these unsettled Chalk Hills. It represents an unprecedented and major departure from the existing landscape pattern of Greater Cambridge and from the plan area's settlement pattern* [PL/1.1.4].
>
> *The proposed allocation would cause adverse effects to key landscape characteristics and landscape sensitivities, particularly of the Chalk Hills landscape, as described in the Landscape Character Assessment. Development would not contribute to landscape management guidance for the area. Major adverse effects could not be mitigated by masterplanning, site layout or design* [PL/1.1.7].

The consequence is that the sensitive Chalk Hills Landscape Character cannot be conserved, protected or enhanced as required by policy GP/LC [JB/3.2-3.7; PL/1.1.4].

(2) Critical transport Infrastructure delivery is uncertain/ may be undeliverable

(i) There are fundamental funding and delivery risks for critical transport infrastructure including (i) the making of the Transport and Works Act Order for the Cambridge South East Transport (CSET) and funding gaps [JR/3.40-3.43] and (ii) the delivery of *inter alia* a new bridge over the A11 from the CSET travel hub into the site necessary to demonstrate a sustainable and deliverable transport strategy to support the allocation [JB/2.27; JR/3.44]. This matters because there are presently significant constraints on walking and cycling from the site to employment facilities and services [JR/3.7-3.20; 3.46] and limited public (bus) transport [JR/3.21-3.23' 3.47] and existing road network constraints [JR/3.24-3.20; 3.49] and road safety considerations [JR/3.31-3.37]. As the transport expert John Russell records, the uncertainty over delivery of CSET and the extension are such that without this essential infrastructure the traffic impacts would mean the allocation is unsustainable [JR/3.52]: -

Given the scale of the Site and the existing limitations of the transport network, any significant delay to, or failure to deliver CSET would fundamentally undermine the transport sustainability of Grange Farm.

(ii) The developer-led CSET extension into the Grange Farm site is critical to delivery of a sustainable transport strategy [JR/3.52] but relies on uncertain developer funding where site constraints may reduce capacity and so must be tested against viability and therefore deliverability of the extension is unconfirmed [JB/2.28-2.31; 3.19-3.21; 4.7-4.13]. The CSET and CSET extension uncertainties present a substantial risk to delivery of the site as James Bailey records [JB/4.13].

If either scheme is substantially delayed or does not proceed, the basis for allocating Grange Farm as a sustainable new settlement would be fundamentally undermined. Any smaller scheme would require a fresh assessment of its transport impacts, infrastructure requirements, viability and ability to deliver the Plan's strategic objectives. On the evidence presently available, the necessary delivery case has not been demonstrated and the allocation should be deleted.

(3) Heritage harm

(i) The amber HELAA rating for Designated Heritage Assets comprising *inter alia* Worsted Street, a Scheduled Ancient Monument Roman road and a Bronze age Barrow Cemetery SAM [ND/1.2][2] has not been fully considered [JB/2.17-2.19] in circumstances where Councils' recent HIA 2026 identifies the risk of significant residual heritage harm as high and undermines the amber rating of risks as capable of mitigation [JB/2.21-2.24]. The heritage expert Dr Doggett concurs with the HIA on high

[2] Dr Doggett considers all the designated heritage assets in his report at 2.1-2.27.

residual risks to the Worsted Street principally because suggested 'buffer' to open land to the south is insufficient to preserve the significance of the setting of the Roman Road as a SAM [JB/3.8-3.9. ND/3.10-3.11].

(4) Loss of BMV farm land

(i) When tested against the 2024 NPPF and the new Defra maps which indicate that almost all of the farm land is BMV land (Grade 2 or Grade 3a) the site selection is not justified in national planning policy terms [JB/3.12-3.18].

(5) Risk to Water resources

(i) Finally the high-risk ground water environment (a chalk aquifer and chalk stream) at Grange Farm gives rise to significant uncertainties for water resource safety, uncertainties over costs for waste treatment and surface water discharge measures which have not been adequately explored in accordance with EA guidance and puts the groundwater environment at significant risk and uncertainty [JB/3.23-3.26; GWP, pgs 1-3]. At an absolute minimum stringent water safety conditions need to be incorporated into the policy if it proceeds in the submission draft plan as explained by GWP.

Objection to proposed Policy S/DS

7. The Plan is unsound because of the over reliance on new settlements, including Grange Farm, for delivery of the Councils' Development Strategy (Policy S/DS) where a significant proportion of the housing is likely to come forward after the plan period and therefore poses a significant risk to the Councils' development strategy [JB/2.32]. Specifically, the Grange Farm trajectory is 2,550 by 2045 but this is uncertain given the critical infrastructure relied upon to deliver such housing including CSET and the CSET extension [JB/2.33-2.34].

8. This uncertainty undermines the strategy where other allocations including Cambourne North which will benefit from the recent TWAO for C-to-C busway warrant reconsideration [JB/2.35-2.38] along with reconsideration of smaller sites and increased densities at existing allocations [JB/2.39-2.43].

Conclusion

9. As Steven Stroud explains, the evidence identifies fundamental weaknesses in the justification for allocating Grange Farm and in the assumptions supporting its capacity and delivery. The

Councils have not demonstrated that the proposed settlement can accommodate the necessary environmental safeguards while providing the homes, infrastructure and services upon which its sustainability depends.

10. The consequence is that Policy S/GF has significant delivery risks that undermine the overall housing delivery strategy in circumstances where alternatives have not been fully explored.

11. For these reasons, the Parish Council respectfully requests deletion of Policy S/GF and the associated allocation from the Policies Map. The Councils are urged to reassess the housing supply position, including the remaining headroom, and test whether any additional provision which is needed to maintain a sound and sufficiently flexible strategy can be secured through the reasonable alternatives identified in the James Bailey representations.

Please provide a 100 word summary of your representation.

Policy S/GF

Plan fails the test of soundness due to inconsistent assessment of harm to the Chalk Hills landscape where mitigation is uncertain/undeliverable, uncertain transport mitigation for a scheme that cannot proceed without the new transport infrastructure, incomplete assessment of heritage harm to SAMs uncertain water risks, and loss of BMV farmland.

Policy S/DS

The Plan has an over reliance on new settlements, including Grange Farm, for delivery of the Development Strategy where a significant proportion of the housing is likely to come forward after the plan period and therefore poses a significant risk to the Councils' development strategy.

Section 4: Supporting Documents

If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

Please find attached to the email enclosing this completed submission form, the following documents:

1. Richard Buxton Solicitors Covering letter, dated 25 September 2026 (its content is set out in Section 3 above)
2. Bundle of expert reports comprising of
    a. Planning Matters and Evidence Basis – Steven Stroud MRPTI, James Bailey Planning [JB]
    b. Landscape – Pete Leaver CMLI, Robert Davies John West Ltd [PL]
    c. Transport - John Russell, CMILT, MCIHT, JR Transport Planning [JR]
    d. Flood Risk and Hydrology – John Sutton BSc, MSc, GWP Hydrogeological Consultants [GWP]
    e. Heritage – Dr Nicholas Doggett, FSA, MICfA, IHBC, Asset Heritage Consulting Ltd. [ND]

Section 5: Proposed Modifications

Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.

You will need to say why each modification will make the Greater Cambridge Local Plan legally compliant or sound. Please put forward your suggested revised wording of any policy or paragraph, being as precise as possible.

APC requests deletion of Policy S/GF and its Policies Map allocation, and modification of Policy S/DS and the housing trajectory to remove reliance on Grange Farm. These changes are necessary because the allocation's environmental acceptability, capacity and infrastructure delivery have not been adequately demonstrated.

The Councils should correct the inconsistencies in the site-selection and Sustainability Appraisal evidence and reassess reasonable alternatives, including suitable intensification, earlier delivery at existing allocations and additional small sites. That assessment should establish whether further provision is needed, taking account of remaining housing headroom, and inform the amendments required to achieve a justified and effective development strategy.

Without prejudice to that primary position, if Grange Farm is retained, APC seeks the following amendments to Policy S/GF and its supporting allocation diagram/spatial framework plan:

- Require an evidenced land-use budget and capacity assessment accounting for infrastructure and environmental safeguards. Amend the allocation's capacity, boundary and housing trajectory accordingly, so that the assumed housing contribution reflects what can realistically be accommodated.

- Specify landscape buffers, retained open land, building-height limits and long-term management measures to conserve the affected heritage assets and their settings. These must include a substantially wider Roman Road buffer and substantial open land behind 8 Cambridge Road, and address the barrow cemetery, Worsted Lodge Farmhouse, Great and Little Abington Conservation Area and Grange Farmhouse.

- Require CSET Phase 2 and its extension into Grange Farm, together with funded public transport services, to be operational before first occupation. Delete the exception permitting reliance on temporary public transport arrangements, to prevent occupation without the permanent connection on which the allocation depends.

- Require a costed and funded transport infrastructure delivery strategy, identifying delivery responsibilities, programmes and triggers for critical and essential works. Establish measurable trip-budget thresholds, funded corrective measures and enforceable occupation controls compatible with the allocation's capacity and trajectory.

- Prohibit occupation of any phase until sufficient sustainable water supply capacity and the necessary infrastructure are available, confirmed in consultation with Cambridge Water and the Environment Agency. Require the phasing plan to identify reliance on the Grafham Transfer and Fens Reservoir, or an equivalent sustainable alternative, so that occupation does not exceed available supply.

- Require a deliverable wastewater strategy with the first planning application. Any on-site discharge to ground must be supported by hydrogeological assessment and modelling demonstrating protection of the aquifer, public water supplies and River Granta, and a realistic prospect of obtaining the necessary permit. Otherwise, an off-site solution must be secured. Occupation must await operational infrastructure with agreed ownership, management and monitoring arrangements in place.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to justify your representation and any proposed modification(s), as there will not be a subsequent opportunity to make further representations other than at the invitation of the Inspector during the Examination process.

Section 6: Participation at the Examination

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Examination	**Yes / No**
Participate at the hearing sessions	Yes

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary.

The representations concern highly technical matters; it is therefore necessary to address the Inspectors directly to ensure that the objections are fully understood.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in Examination hearing sessions. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Section 7: Being Kept Informed

Would you like to be kept informed of the progress of the Greater Cambridge Local Plan through to adoption?

Notifications	**Yes / No**
Informed of submission of the Local Plan to the Secretary of State for independent Examination	Yes
Informed of the publication of the Inspector's recommendations following the Examination of the Local Plan	Yes
Informed of adoption of the Local Plan	Yes